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BROOKLYN OFFICE

JAMES E. JOHNSON
Corporation Counsel



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December 19, 2019

VIA HAND

Peter Dee, Esq.
Mavronicolas & Dee, LLP
228 E. 45th St., 6th Floor
New York, N.Y. 10017

Re: Patricia Ranta, et. al. v. City of New York, et. al., 14 Civ. 3794 (FB)(LB)

Dear Mr. Dee:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, Stephen Chmil and NYPD (a non-suable entity) in the above referenced matter. Please find enclosed herewith the 1) notice of motion to dismiss by the foregoing defendants; 2) Declaration of Mark D. Zuckerman, dated December 19, 2019 and exhibit annexed thereto; 3) Memorandum of Law in support of motion to dismiss.

If questions, please let me know.

Respectfully submitted,

Mark D. Zuckerman
Senior Counsel

cc: Richard Signorelli, Esq. (via hand)(with enclosures)
Hon. Frederic Block (via First Class mail)(without enclosures)
Hon. Lois Bloom (via First Class mail)(without enclosures)

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